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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10 C.S.,

CASE NO. 24-cv-04992

11 Plaintiff,

**PLAINTIFF'S NOTICE OF
RELATED CASES**

12 v.

13 MINDGEEK S.A.R.L., a foreign entity;
MG FREESITES LTD, a foreign entity;
14 MINDGEEK USA INCORPORATED,
a Delaware corporation; MG
15 PREMIUM LTD, a foreign entity; MG
GLOBAL ENTERTAINMENT INC., a
16 Delaware corporation; 9219-1568
QUEBEC, INC., a foreign entity;
17 BERND BERGMAIR, a foreign
individual; FERAS ANTOON, a
18 foreign individual; DAVID
TASSILLO, a foreign individual; VISA
19 INC., a Delaware corporation;
REDWOOD CAPITAL
20 MANAGEMENT, LLC, a Delaware
limited liability company; REDWOOD
21 DOE FUNDS 1-7; COLBECK
CAPITAL MANAGEMENT, LLC, a
22 Delaware limited liability company;
COLBECK DOE FUNDS 1-3,

23 Defendants.
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1 C.S. hereby files this Notice of Related Cases under Central District of
2 California Local Rule 83-1.3.1. The following cases have a substantial overlap in
3 defendants and have some of the same factual allegations. It would further the
4 interests of judicial efficiency to have them heard by the same judge.

5 1. *Jane Doe v. MindGeek USA Incorporated et al.*, Case No. 8:21-cv-
6 00338-WLH-ADS, filed on February 19, 2021 in this District Court, is currently
7 pending before the Honorable Wesley L. Hsu. This is a class action seeking
8 damages and injunctive relief against defendants – (i) MindGeek USA Incorporated
9 (ii) MindGeek S.A.R.L.; (iii) MG Freesites, Ltd., (d/b/a Pornhub); (iv) MG Freesites
10 II, Ltd.; (v) MG Content RT Limited; and (vi) 9219-1568 Quebec Inc. (d/b/a
11 MindGeek) – based on allegations that defendants violated the Trafficking Victims
12 Protection Reauthorization Act (“TVPRA”), specifically 18 U.S.C. §§ 1591 and
13 1595, among other laws, by financially benefiting from, or otherwise participating
14 in, a sex trafficking venture in which plaintiff and members of the class were
15 victims. Further, plaintiff alleges that the defendants violated 18 U.S.C. § 2258A by
16 failing to report child sexual abuse materials on their websites and 18 U.S.C.
17 § 2252A for knowingly receiving and distributing child pornography depicting
18 plaintiff and the class on their websites. Plaintiff also asserts state statutory and
19 common law violations. On November 17, 2023, the Court granted Plaintiff’s
20 Motion for Class Certification and certified under both Federal Rules of Civil
21 Procedure 23(b)(2) and 23(b)(3) two classes. (Dkt. 209, Order Granting Plaintiff’s
22 Motion for Class Certification, *Jane Doe v. MindGeek USA Incorporated et al.*, Case
23 No. 8:21-cv-00338-WLH-ADS (C.D. Cal. 2021).) The Court first certified a
24 national class including “all persons who were under the age of 18 when they
25 appeared in a video or image that has been uploaded or otherwise made available for
26 viewing on any website owned or operated by Defendants in the last ten years.”
27 (Dkt. 107 at 44, ¶ 154.) The Court next certified a subclass of “all persons residing
28 in California who were under the age of 18 when they appeared in a video or image

1 that has been uploaded or otherwise made available for viewing on any website
2 owned or operated by Defendants in the last ten years.” (*Id.* at ¶ 155.) Plaintiff in
3 this related action is represented by the following counsel: Susman Godfrey L.L.P.
4 and Pollock Cohen LLP.

5 2. *Serena Fleites v. MindGeek S.A.R.L. et al.*, Case No. 2:21-cv-4920-
6 WLH-ADS, filed on June 17, 2021 in this District Court, is currently pending before
7 the Honorable Wesley L. Hsu. Plaintiff in this case is seeking damages and
8 injunctive relief against defendants – (i) MindGeek S.A.R.L.; (ii) MG Freesites, Ltd.
9 d/b/a Pornhub; (iii) MindGeek USA Incorporated; (iv) MG Premium Ltd.; (v) MG
10 Global Entertainment, Inc.; (vi) 9219-1568 Quebec, Inc.; (vii) Bernd Bergmair; (viii)
11 Feras Antoon; (ix) David Tassillo; (x) Visa Inc.; (xi) Redwood Capital Management,
12 LLC¹; and (xii) Colbeck Capital Management, LLC² – for sex trafficking and
13 conspiracy to benefit from a trafficking venture in violation of 18 U.S.C. §§ 1591,
14 1594, and 1595, for receipt, transport, and possession of child pornography in
15 violation of 18 U.S.C. §§ 2252, 2252A, and 2255, and state statutory and common
16 law violations. Plaintiff in this related action is represented by the following
17 counsel: Brown Rudnick LLP and Olson Stein LLP.

18 3. *K.A. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04786-JFW-MAA,
19 filed on June 7, 2024 in this District Court, is currently pending before the
20 Honorable John F. Walter and the Honorable Maria A. Audero. Plaintiff in this case
21 is seeking damages and injunctive relief against defendants – (i) MindGeek
22 S.A.R.L.; (ii) MG Freesites, Ltd., d/b/a Pornhub; (iii) MindGeek USA Incorporated;
23 (iv) MG Premium Ltd.; (v) MG Global Entertainment Inc.; (vi) 9219-1568 Quebec,
24 Inc., d/b/a MindGeek; (vii) Bernd Bergmair; (viii) Feras Antoon; (ix) David
25

26 ¹ Plaintiff also named as defendants certain related funds of Redwood Capital
27 Management, LLC, the names of which were filed under seal.

28 ² Plaintiff also named as defendants certain related funds of Colbeck Capital
Management, LLC, the names of which were filed under seal.

1 Tassillo; (x) Visa Inc.; (xi) Redwood Capital Management, LLC; (xii) Redwood Doe
2 Funds 1-7; (xiii) Colbeck Capital Management, LLC; and (xiv) Colbeck Doe Funds
3 1-3 – for sex trafficking and conspiracy to benefit from a trafficking venture in
4 violation of 18 U.S.C. §§ 1591, 1594, and 1595, for receipt, transport, and
5 possession of child pornography in violation of 18 U.S.C. §§ 2252, 2252A, and
6 2255, and state statutory and common law violations. Plaintiff in this related action
7 is represented by the following counsel: Brown Rudnick LLP and Olson Stein LLP.

8 4. *N.L. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04788-MWF-AGR,
9 filed on June 7, 2024 in this District Court, is currently pending before the
10 Honorable Michael W. Fitzgerald and the Honorable Alicia G. Rosenberg. Plaintiff
11 in this case is seeking damages and injunctive relief against defendants – (i)
12 MindGeek S.A.R.L.; (ii) MG Freesites, Ltd., d/b/a Pornhub; (iii) MindGeek USA
13 Incorporated; (iv) MG Premium Ltd.; (v) MG Global Entertainment Inc.; (vi) 9219-
14 1568 Quebec, Inc., d/b/a MindGeek; (vii) Bernd Bergmair; (viii) Feras Antoon; (ix)
15 David Tassillo; (x) Visa Inc.; (xi) Redwood Capital Management, LLC; (xii)
16 Redwood Doe Funds 1-7; (xiii) Colbeck Capital Management, LLC; and (xiv)
17 Colbeck Doe Funds 1-3 – for sex trafficking and conspiracy to benefit from a
18 trafficking venture in violation of 18 U.S.C. §§ 1591, 1594, and 1595, for receipt,
19 transport, and possession of child pornography in violation of 18 U.S.C. §§ 2252,
20 2252A, and 2255, and state statutory and common law violations. Plaintiff in this
21 related action is represented by the following counsel: Brown Rudnick LLP and
22 Olson Stein LLP.

23 5. *L.T. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04791-JFW-PVC,
24 filed on June 7, 2024 in this District Court, is currently pending before the
25 Honorable John F. Walter and the Honorable Pedro V. Castillo. Plaintiff in this case
26 is seeking damages and injunctive relief against defendants – (i) MindGeek
27 S.A.R.L.; (ii) MG Freesites, Ltd., d/b/a Pornhub; (iii) MindGeek USA Incorporated;
28 (iv) MG Premium Ltd.; (v) MG Global Entertainment Inc.; (vi) 9219-1568 Quebec,

1 Inc., d/b/a MindGeek; (vii) Bernd Bergmair; (viii) Feras Antoon; (ix) David
2 Tassillo; (x) Visa Inc.; (xi) Redwood Capital Management, LLC; (xii) Redwood Doe
3 Funds 1-7; (xiii) Colbeck Capital Management, LLC; and (xiv) Colbeck Doe Funds
4 1-3 – for sex trafficking and conspiracy to benefit from a trafficking venture in
5 violation of 18 U.S.C. §§ 1591, 1594, and 1595, for receipt, transport, and
6 possession of child pornography in violation of 18 U.S.C. §§ 2252, 2252A, and
7 2255, and state statutory and common law violations. Plaintiff in this related action
8 is represented by the following counsel: Brown Rudnick LLP and Olson Stein LLP.

9 6. *T.C. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04795-MRA-PD,
10 filed on June 7, 2024 in this District Court, is currently pending before the
11 Honorable Monica Ramirez Almadani and the Honorable Patricia Donahue.
12 Plaintiff in this case is seeking damages and injunctive relief against defendants –
13 (i) MindGeek S.A.R.L.; (ii) MG Freesites, Ltd., d/b/a Pornhub; (iii) MindGeek USA
14 Incorporated; (iv) MG Premium Ltd.; (v) MG Global Entertainment Inc.; (vi) 9219-
15 1568 Quebec, Inc., d/b/a MindGeek; (vii) Bernd Bergmair; (viii) Feras Antoon; (ix)
16 David Tassillo; (x) Visa Inc.; (xi) Redwood Capital Management, LLC; (xii)
17 Redwood Doe Funds 1-7; (xiii) Colbeck Capital Management, LLC; and (xiv)
18 Colbeck Doe Funds 1-3 – for sex trafficking and conspiracy to benefit from a
19 trafficking venture in violation of 18 U.S.C. §§ 1591, 1594, and 1595, for receipt,
20 transport, and possession of child pornography in violation of 18 U.S.C. §§ 2252,
21 2252A, and 2255, and state statutory and common law violations. Plaintiff in this
22 related action is represented by the following counsel: Brown Rudnick LLP and
23 Olson Stein LLP.

24 7. *X.N. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04800-DMG-KS,
25 filed on June 7, 2024 in this District Court, is currently pending before the
26 Honorable Dolly M. Gee and the Honorable Karen L. Stevenson. Plaintiff in this
27 case is seeking damages and injunctive relief against defendants – (i) MindGeek
28 S.A.R.L.; (ii) MG Freesites, Ltd., d/b/a Pornhub; (iii) MindGeek USA Incorporated;

(iv) MG Premium Ltd.; (v) MG Global Entertainment Inc.; (vi) 9219-1568 Quebec, Inc., d/b/a MindGeek; (vii) Bernd Bergmair; (viii) Feras Antoon; (ix) David Tassillo; (x) Visa Inc.; (xi) Redwood Capital Management, LLC; (xii) Redwood Doe Funds 1-7; (xiii) Colbeck Capital Management, LLC; and (xiv) Colbeck Doe Funds 1-3 – for sex trafficking and conspiracy to benefit from a trafficking venture in violation of 18 U.S.C. §§ 1591, 1594, and 1595, for receipt, transport, and possession of child pornography in violation of 18 U.S.C. §§ 2252, 2252A, and 2255, and state statutory and common law violations. Plaintiff in this related action is represented by the following counsel: Brown Rudnick LLP and Olson Stein LLP.

8. *N.Y. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04801-CBM-JPR, filed on June 7, 2024 in this District Court, is currently pending before the Honorable Consuelo B. Marshall and the Honorable Jean P. Rosenbluth. Plaintiff in this case is seeking damages and injunctive relief against defendants – (i) MindGeek S.A.R.L.; (ii) MG Freesites, Ltd., d/b/a Pornhub; (iii) MindGeek USA Incorporated; (iv) MG Premium Ltd.; (v) MG Global Entertainment Inc.; (vi) 9219-1568 Quebec, Inc., d/b/a MindGeek; (vii) Bernd Bergmair; (viii) Feras Antoon; (ix) David Tassillo; (x) Visa Inc.; (xi) Redwood Capital Management, LLC; (xii) Redwood Doe Funds 1-7; (xiii) Colbeck Capital Management, LLC; and (xiv) Colbeck Doe Funds 1-3 – for sex trafficking and conspiracy to benefit from a trafficking venture in violation of 18 U.S.C. §§ 1591, 1594, and 1595, for receipt, transport, and possession of child pornography in violation of 18 U.S.C. §§ 2252, 2252A, and 2255, and state statutory and common law violations. Plaintiff in this related action is represented by the following counsel: Brown Rudnick LLP and Olson Stein LLP.

9. *J.C. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04971, filed on June 12, 2024 in this District Court. Plaintiff in this case is seeking damages and injunctive relief against defendants – (i) MindGeek S.A.R.L.; (ii) MG Freesites, Ltd., d/b/a Pornhub; (iii) MindGeek USA Incorporated; (iv) MG Premium Ltd.; (v) MG Global Entertainment Inc.; (vi) 9219-1568 Quebec, Inc., d/b/a MindGeek;

1 (vii) Bernd Bergmair; (viii) Feras Antoon; (ix) David Tassillo; (x) Visa Inc.; (xi)
2 Redwood Capital Management, LLC; (xii) Redwood Doe Funds 1-7; (xiii) Colbeck
3 Capital Management, LLC; and (xiv) Colbeck Doe Funds 1-3 – for sex trafficking
4 and conspiracy to benefit from a trafficking venture in violation of 18 U.S.C. §§
5 1591, 1594, and 1595, for receipt, transport, and possession of child pornography in
6 violation of 18 U.S.C. §§ 2252, 2252A, and 2255, and state statutory and common
7 law violations. Plaintiff in this related action is represented by the following
8 counsel: Brown Rudnick LLP and Olson Stein LLP.

9 10. *W.L. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04977, filed on
10 June 13, 2024 in this District Court. Plaintiff in this case is seeking damages and
11 injunctive relief against defendants – (i) MindGeek S.A.R.L.; (ii) MG Freesites,
12 Ltd., d/b/a Pornhub; (iii) MindGeek USA Incorporated; (iv) MG Premium Ltd.;
13 (v) MG Global Entertainment Inc.; (vi) 9219-1568 Quebec, Inc., d/b/a MindGeek;
14 (vii) Bernd Bergmair; (viii) Feras Antoon; (ix) David Tassillo; (x) Visa Inc.; (xi)
15 Redwood Capital Management, LLC; (xii) Redwood Doe Funds 1-7; (xiii) Colbeck
16 Capital Management, LLC; and (xiv) Colbeck Doe Funds 1-3 – for sex trafficking
17 and conspiracy to benefit from a trafficking venture in violation of 18 U.S.C. §§
18 1591, 1594, and 1595, for receipt, transport, and possession of child pornography in
19 violation of 18 U.S.C. §§ 2252, 2252A, and 2255, and state statutory and common
20 law violations. Plaintiff in this related action is represented by the following
21 counsel: Brown Rudnick LLP and Olson Stein LLP.

1 DATED: June 13, 2024

Respectfully submitted,

2 **BROWN RUDNICK LLP**

3
4 By: /s/ Michael J. Bowe

5 Michael J. Bowe

6 (*pro hac vice* application forthcoming)

7 Lauren Tabaksblat

8 (*pro hac vice* application forthcoming)

9 *Attorneys for Plaintiff*